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July 3, 2025

**VIA ELECTRONIC MAIL**

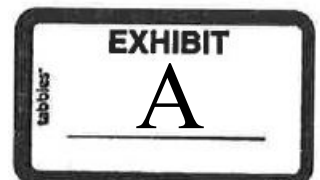
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Re: COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING as  
Owner and Operator of M/T Mackenzie Rose (IMO No. 8968765), etc.  
United States District Court, Eastern District of Virginia, Case No. 2:24-cv-00490

Dear Mr. Rodgers:

On April 28, 29, and 30, counsel for the Belt Line deposed Carver's General Manager Brian Moore, Deckhand Jarkeis Morrissey, Deckhand Sharif Porter, and former Port Captain Leonard Baldassare. And on June 17, 2025, the Belt Line deposed Carver's 30(b)(6) representative, Nick Laraway. During these depositions, Carver's counsel made over 160 speaking objections and instructed the witnesses not to answer 12 times.

Such conduct is improper under Rule 30 of the Federal Rules of Civil Procedure and obstructed the Belt Line's ability to properly depose the witnesses regarding information relating to the limitation action. Given the obstructionist tactics used throughout depositions in this matter, re-deposition of the witnesses would be an insufficient remedy. The only feasible remedy for this obstruction is the dismissal of the limitation portion of this case. Accordingly, we request that you voluntarily dismiss Carver's Limitation Complaint to avoid the necessity of seeking Court intervention.



James H. Rodgers, Esq.

July 3, 2025

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If the above relief is granted, either voluntarily or by Court Order, the Belt Line will still proceed with its negligence claim and proof of resulting damages.

Please reach out to my office to provide your availability for a meet and confer for **Monday, July 7, 2025** regarding the matters in this letter.

Very truly yours,

/s/ James L. Chapman  
James L. Chapman, IV

JLC/tal

cc: Counsel of Record